



**FAQ Number:** 1382

**Date Published:** May 22, 2009

**Last Updated:** May 22, 2009

**Question:** There are chemicals of interest in the piping at my facility. What do I count and how do I count it toward the STQ?

**Answer:**

Pursuant to § 27.203(b)(1)(i), facilities must include release chemicals in a vessel, as defined by 40 CFR § 68.3. The definition of a "vessel" includes piping. When determining if the facility possesses the applicable screening threshold quantity, the following are provided for purposes of applying this requirement at a facility with chemicals of interest.

\* If the piping contains COI and is run between unit operations at the facility, then the facility must count the COI toward the STQ. An example would be phosgene that is manufactured at a facility then piped directly to manufacture polycarbonate plastic.

\* If the piping contains COI and is supplied from another vessel at the facility, then the facility must count the COI in the piping, the other vessel or any other unit operation toward the STQ. An example would be any COI chemical stored in a tank that is piped directly to a unit operation at the facility. (However, the same mass of the COI need not be counted more than one time as it traverses through the process for a release-flammable chemical.)

\* However, if the piping contains COI and runs through the facility, but the facility does not possess the COI (e.g., no COI is withdrawn from or supplied to the pipeline by the facility), the facility need not count the COI. An example would be a natural gas pipeline that traverses below ground through a facility's property yet never supplies product to the facility.